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*Proposed Counsel for Debtors and  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:  
Powin, LLC, *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11  
  
Case No. 25-16137 (MBK)  
  
(Jointly Administered)

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504], (iii) PEOS Holdings, LLC [5476], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [15241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487] (x) Powin Energy Storage 2, Inc. [9926]; (xi) Powin Energy Ontario Storage II LP [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**DEBTORS' APPLICATION FOR ENTRY OF AN ORDER SHORTENING TIME FOR  
HEARING ON MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (I)  
APPROVING KEY EMPLOYEE RETENTION PLAN AND KEY EMPLOYEE  
INCENTIVE PLAN AND (II) GRANTING RELATED RELIEF**

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**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Powin, LLC ("Powin") and the above-referenced affiliated debtors and debtors in possession (collectively, the "Debtors") in these chapter 11 cases (the "Chapter 11 Cases"), by and through their undersigned counsel, request that the time period for responding to the *Motion of the Debtors for Entry of an Order (I) Approving Key Employee Retention Plan and Key Employee Incentive Plan and (II) Granting Related Relief* filed concurrently herewith (the "KEIP and KERP Motion")<sup>2</sup> be shortened pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for the reason(s) set forth below:

1. A shortened time hearing is requested because: as set forth in the KEIP and KERP Motion, the KEIP and KERP contemplate making payments to the KEIP Participants and KERP Participants, as applicable, on or shortly after the closing of the Sale Transaction. The Sale Hearing to approve the Sale Transaction is scheduled for August 6, 2025 [Docket No. 413], and closing of the Sale Transaction will occur shortly thereafter. The KEIP and KERP were structured to retain and incentivize the Debtors' remaining employees to maximize sale value and creditor-recoveries. As set forth in the KEIP and KERP Motion, the KEIP and KERP allow the Debtors to pay all of their remaining employees an equal percentage – ten (10) – of salary due upon any sale closing for the KERP Participants and that is earned by KEIP Participants for compliance with the DIP budget and for closing a sale in excess of \$40 million in cash or cash considerations. The Debtors cannot sell their assets without their remaining employees, and the KERP and KEIP are reasonable and

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the KEIP and KERP Motion.

necessary for the success of the sale process and these Chapter 11 Cases. These Chapter 11 Cases are moving at a fast pace, which is necessary for the Debtors to complete the Sale Transaction and maximize recovery to the Debtors' estates. The Debtors believe that losing employees during this critical time would severely disrupt the Debtors' ability to complete the Sale Transaction and maximize value for their creditors and other constituents.

2. The Debtors consulted with and addressed questions from the Official Committee of Unsecured Creditors (the "Committee") in developing the KERP and KEIP, and the Committee does not object to this application to shorten time.

3. State the hearing dates requested: the Debtors respectfully request that the Court hear the KEIP and KERP Motion on August 6, 2025 at 11:30 a.m., a date that is already scheduled for a hearing in these Chapter 11 Cases. A hearing on August 6, 2025 balances the Debtors' need to implement the proposed KEIP and KERP with their desire to provide parties in interest with an opportunity to review the KEIP and KERP Motion in advance of the hearing.

4. Reduction of the time period is not prohibited under Bankruptcy Rule 9006(c)(1). The Debtors request entry of the proposed order shortening time.

Dated: July 23, 2025

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/s/ Lauren Macksoud

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